

AO 91 (Rev. 08/09) Criminal Complaint

DENVER
FILED

UNITED STATES DISTRICT COURT

2011 MAR 29 AM 11:26

for the

Western District of Texas

CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America)

v.)

Leroy Henry Jones)

Case No. A-11-M-230)

BY _____
DEPUTY

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2, 2011 in the county of Travis in the
Western District of Texas, the defendant(s) violated:

Code Section

Title 18, USC Section 2113 (a)

Offense Description

by force and violence, and by intimidation, take, from the person or presence of another, money belonging to and in the care, custody, control, management and possession of Wells Fargo Bank, 2326 South Congress Avenue, Austin, Texas, a financial institution insured by the Federal Deposit Insurance Corporation.

This criminal complaint is based on these facts:

☐ Continued on the attached sheet.

Complainant's signature

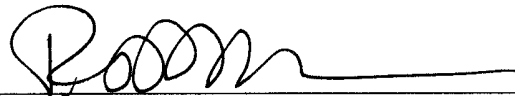
Shawn L. Scott, TFO-FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

3/29/11



Judge's signature

ROBERT PITMAN

U.S. MAGISTRATE JUDGE

Printed name and title

City and state:

Austin, Texas

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

FILED
2011 MAR 29 AM 11:27
CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature]
DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEROY HENRY JONES,

Defendant.

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CRIMINAL NO.

A-11-M-230

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Shawn L. Scott, being duly sworn, hereby depose and say the following:

1. I am a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI).

I am currently assigned to the San Antonio Field Office, Austin Resident Agency. My duties and responsibilities include investigation of violations of federal criminal laws, including bank robberies.

2. I am conducting a criminal investigation into a bank robbery occurring on March 2, 2011, at Wells Fargo Bank, located at 2326 South Congress Avenue, Austin, Texas, in the Western District of Texas.

3. The information in this affidavit is based upon my personal observations and credible information provided to me by other law enforcement officers. This affidavit does not contain all of the information concerning this investigation that is known to me or to law enforcement officers but describes only those relevant facts necessary to establish probable cause that LEROY HENRY JONES (Jones) committed the offenses set forth in the attached Criminal

Complaint attached hereto.

4. There is probable cause to believe that Jones committed the offenses set forth in the attached Criminal Complaint based on the following facts:

a. On March 2, 2011, a bank robbery occurred at Wells Fargo Bank, at 2326 South Congress Avenue, Austin, Texas, in the Western District of Texas. The suspected robber entered the bank and approached a teller at the teller counter. The robber made an oral demand to the teller for money. The teller complied with the robber's demand providing him with approximately \$2061.00 in United States currency. The robber exited the bank with the money. Witnesses described the robber as a white male, late forties to early fifties, full moustache, wearing a University of Texas (UT) baseball cap, along with an orange UT jacket. Bank surveillance cameras captured images of the alleged robber and were provided to the FBI by Wells Fargo Bank security. At the time of the robbery, the deposits of the Wells Fargo Bank were insured by the Federal Deposit Insurance Corporation.

b. Immediately after the robbery, a witness observed a male running through the parking lot located west of the Wells Fargo Bank. The witness watched as the male ran to a white Ford F-250 truck. The witness observed the male removing an orange UT baseball cap and an orange UT jacket. The male entered the driver's side of the white Ford F-250, departed from the parking lot, and was last seen driving westbound on Cumberland Road.

c. The witness believed the male's actions were suspicious and recorded the truck's Texas license plate number as 94C-MK9. The witness also photographed the license plate with his cellular phone camera. The witness provided law enforcement with the above information upon learning of the robbery.

d. Investigation revealed that Texas license plate 94C-MK9 is registered to a 2003 Ford truck and that the registered owner of the vehicle is LEROY HENRY JONES, W/M, date of birth 01/20/1960. TFO Charles Kleinert obtained and compared photos of JONES to the digital images of the suspect provided by Wells Fargo Bank. TFO Kleinert advised the photos of JONES looked similar to the images of the robbery suspect captured by Wells Fargo Bank.

e. On 03/02/2011, a photo lineup was generated by TFO Charles Kleinert and displayed to a bank employee who was present during the robbery. The photo lineup consists of a photograph of JONES. The witness positively identified JONES as the person who committed the Wells Fargo Bank robbery at 2326 South Congress Avenue, Austin, Texas, on 03/02/2011.

f. On 03/02/2011, a state felony robbery arrest warrant was issued for LEROY HENRY JONES, W/M, date of birth 01/20/1960. The warrant is further identified by cause number D1DC11300489.

g. On 03/05/2011, LEROY HENRY JONES was located and apprehended in Stephenville, Texas. Subsequent to arrest, JONES was interviewed at the Stephenville Police Department by TFO Billy Parks and TFO Shawn Scott. JONES was advised of his constitutional rights, voluntarily waived those rights, and agreed to be interviewed. He voluntarily admitted to committing the robbery at the Wells Fargo Bank, located at 2326 South Congress Avenue in Austin, Texas on 03/02/2011. JONES also admitted to committing prior bank robberies at the Wells Fargo Bank, located at 2326 South Congress Avenue in Austin, Texas on 12/13/2010 and at the Compass Bank, located at 5800 North Mopac Expressway, in Austin, Texas on 12/20/2010. This interview was recorded on a digital video disk.

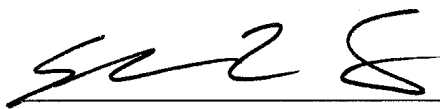
h. On 12/13/2010, a robbery occurred at the Wells Fargo Bank, located at 2326 South Congress Avenue in Austin, Texas. The white male suspect entered the bank and demanded money. The suspect was attired in a baseball cap, hooded sweatshirt, jeans and tennis shoes. The suspect wore a cloth wrapped around his head under his baseball cap.

i. On 12/20/2010, a robbery occurred at the Compass Bank, located at 5800 North Mopac Expressway, in Austin, Texas. The white male suspect entered the bank and demanded money. The suspect was attired in a baseball cap, hooded sweatshirt, jeans and tennis shoes. The suspect wore a cloth wrapped around his head under his baseball cap.

j. Based on the foregoing, there is probable cause to believe that LEROY HENRY JONES committed the offense(s) set forth in the attached Criminal Complaint.

FURTHER AFFIANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct to the best of my belief.



SHAWN L. SCOTT
Task Force Officer
Federal Bureau of Investigation
Austin, Texas

Subscribed and sworn to before me at Austin, Texas, on this 29th day of March, 2011.



UNITED STATES MAGISTRATE JUDGE